Wireless Strategies Inc.

BY HAND

September 17, 2007

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington DC 20554

Re: Wireless Strategies Request for a Declaratory Ruling,
WTB Docket No. 07-121

Dear Ms. Dortch:

Wireless Strategies Inc. submitted herewith pursuant to Section 1.1206 of the Commission's rules are an original and one copy of this notice regarding a permitted ex parte presentation in the above-reference proceeding. On September 17, 2007, Michael Mulcay, Chairman and Frank Bucceri, President, met with Jane Jackson, Associate Bureau Chief, Wireless Telecommunications Bureau. The presentation was a review of comments and reply comments in response to the FCC's Public Notice of June 19, 2007, DA 07-2684.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

Michael Mulcay, Chairman
Wireless Strategies Inc.

cc: Janet Jackson, Associate Bureau Chief, Wireless Telecommunications Bureau

California Office
Tel. 831 659 5618
30 Encina Drive, Carmel Valley, CA 93924
Fax. 831 659 5634

Ex Parte Presentation

Wireless Strategies Inc.

WTB Docket No. 07-121

Wireless Strategies Inc.

Topics

Summary and Review of Comments and Reply Comments in response to the FCC's Public Notice of June 19, 2007

Wireless Strategies Inc.

Topics

WTB Docket No 07-121

- The Evidence Shows:
  - A Declaratory Ruling is the correct vehicle for removing uncertainty
  - Rule 101 of the FCC's Rules does Protect Fixed Service Licensees From Harmful Interference and also Promotes the Effective use of Spectrum
  - WSI's Request meets a Public need and Necessity for the more Effective Use of a Finite National Resource (Spectrum) Under Existing Rules
  - Supports the goals of Congress and the Commission

Other

- Applications
  - The Evidence Shows:
    - No Technology Risk
    - Distance of DREs from the antenna is within the minimum coordination contour
    - Dramatic Increase in the Effective Use of Spectrum
    - Regulations and Market Forces Dictate that the Transmit Power will be the Minimum Necessary to Carry Out the Communications Desired

Topic

WTB Docket No 07-121

Wireless Strategies Inc.

WTB Docket No 07-121

A Declaratory Ruling is the correct vehicle for removing uncertainty

- No Change or Waiver of the Rules is requested
- The FCC's Public Notice has produced questions regarding uncertainties
- The FCC's Public Notice has produced evidence and answers to those uncertainties

WTB Docket No 07-121

Part 101 (and before that Parts 21 and 94) of the Rules has Demonstrated Without Question the Ability to:

- Protect Fixed Microwave Services from Harmful Interference
- Promote the Effective Use of Spectrum

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Rule 101.115

ANTENNA STANDARDS

Frequency (MHz)	Category	Maximum beamwidth to 3 dB points [1] (included angle in degrees)	Minimum antenna gain (dBi)	Minimum radiation suppression to angle in degrees from centerline of main beam in decibels: 5° to 10°	10° to 15°	15° to 20°	20° to 30°	30° to 100°	100° to 140°	140° to 180°
932.5 to 935	A	14.0	n/a	n/a	6	11	14	17	20	24
	B	20.0	n/a	n/a	n/a	6	10	13	15	20
941.5 to 944	A	14.0	n/a	n/a	6	11	14	17	20	24
	B	20.0	n/a	n/a	n/a	6	10	13	15	20
952 to 960 [2,3]	A	14.0	n/a	n/a	6	11	14	17	20	24
	B	20.0	n/a	n/a	n/a	6	10	13	15	20
1,850 to 2,500 [4]	A	5.0	n/a	12	16	22	25	29	33	39
	B	8.0	n/a	5	16	20	20	25	28	36
3,700 to 4,200	A	2.7	36	23	29	33	36	42	55	55
	B	2.7	36	20	24	28	32	32	32	32
5,925 to 6,425 [5]	A	2.2	38	25	29	33	36	42	55	55
	B	2.2	38	21	25	29	32	35	38	45
5,925 to 6,425 [6]	A	2.2	38	25	29	33	36	42	55	55
	B	2.2	38	20	24	28	32	35	36	36
6,525 to 6,875 [5]	A	2.2	38	25	29	33	36	42	55	55
	B	2.2	38	21	25	29	32	35	38	45
6,525 to 6,875 [6]	A	1.5	n/a	26	29	32	34	38	41	49
	B	2.0	n/a	21	25	29	32	35	38	45
10,550 to 10,680 [5,7]	A	2.2	38	25	29	33	36	42	55	55
	B	2.2	38	20	24	28	32	35	36	36
10,550 to 10,680 [7]	A	3.5	33.5	18	24	28	32	35	55	55
	B	3.5	33.5	17	24	28	32	35	40	45
10,565 to 10,615	n/a	360	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
10,630 to 10,680 [8]	n/a	3.5	34	20	24	28	32	35	36	36
10,700 to 11,700 [5]	A	2.2	38	25	29	33	36	42	55	55
	B	2.2	38	20	24	28	32	35	36	36
12,200 to 13,250 [5]	A	1.0	n/a	23	28	35	39	41	42	50
	B	2.0	n/a	20	25	28	30	32	37	47
17,700 to 18,820	A	2.2	38	25	29	33	36	42	55	55
	B	2.2	38	20	24	28	32	35	36	36
18,920 to 19,700 [9]	A	2.2	38	25	29	33	36	42	55	55
	B	2.2	38	20	24	28	32	35	36	36
21,200 to 23,600 [7,11]	A	3.3	33.5	18	24	28	33	33	55	55
	B	3.3	33.5	17	24	24	29	29	40	50
24,250 to 25,250 [9]	A	2.8	38	25	29	33	36	42	55	60
	B	2.8	38	20	24	28	32	35	36	45
31,000 to 31,300 [12,13]	n/a	4.0	39	n/a	n/a	n/a	n/a	n/a	n/a	n/a
38,600 to 40,000 [14]	A	n/a	38	25	29	33	36	42	55	55
	B	n/a	38	20	24	28	32	35	36	36
71,000 to 76,000 (co-polar) [15]	N/A	1.2	43	36	40	45	50	50	55	55
71,000 to 76,000 (cross-polar) [15]	N/A	1.2	43	45	50	50	55	55	55	55
81,000 to 86,000 (co-polar) [16]	N/A	1.2	43	36	40	45	50	50	55	55
81,000 to 86,000 (cross-polar) [15]	N/A	1.2	43	45	50	50	55	55	55	55
92,000 to 95,000	N/A	0.6	50.0	36	40	45	50	55	55	55

[1] If a licensee chooses to show compliance using maximum beamwidth to 3 dB points, the beamwidth limit shall apply in both the azimuth and the elevation planes.

[2] Except for Multiple Address System frequencies listed in §§ 101.147(b)(1) through (b)(4), where omnidirectional antennas may be used.

[3] Antennas used at outlying stations as part of a central protection alarm system need conform to only the following 2 standards:

(i) The minimum on-beam forward gain must be at least 10 dBi, and

(ii) The minimum front-to-back ratio must be at least 20 dB.

[4] Omnidirectional antennas may be authorized in the band 2150–2160 MHz.

[5] These antennas standards apply to all point-to-point stations authorized after June 1, 1997. Existing licensees and pending applicants on that date are grandfathered and need not comply with these standards.

[6] These antennas standards apply to all point-to-point stations authorized on or before June 1, 1997.

[7] Except for antennas between 140° and 180° authorized or pending as January 1, 1990, in the band 10,550 to 10,585 MHz for which minimum radiation suppression to angle (in degrees) from centerline of main beam is 55 decibels.

[8] These antennas standards apply only to DEMS User Stations licensed, in operation, or applied for prior to July 15, 1993.

[9] Except for Temporary-fixed operations in the band 19700–19280 MHz with output powers less than 250 mW and as provided in § 101.147(q), and except for antennas in the MVDDS service in the band 12.2–12.7 GHz.

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Rule 101.115

ANTENNA STANDARDS

Frequency (MHz)	Category	Maximum beamwidth to 3 dB points [1] (included angle in degrees)	Minimum antenna gain (dbi)	Minimum radiation suppression to angle in degrees from centerline of main beam in decibels						
				5° to10°	10° to 15°	15° to 20°	20° to 30°	30° to 100°	100° to 140°	140° to 180°

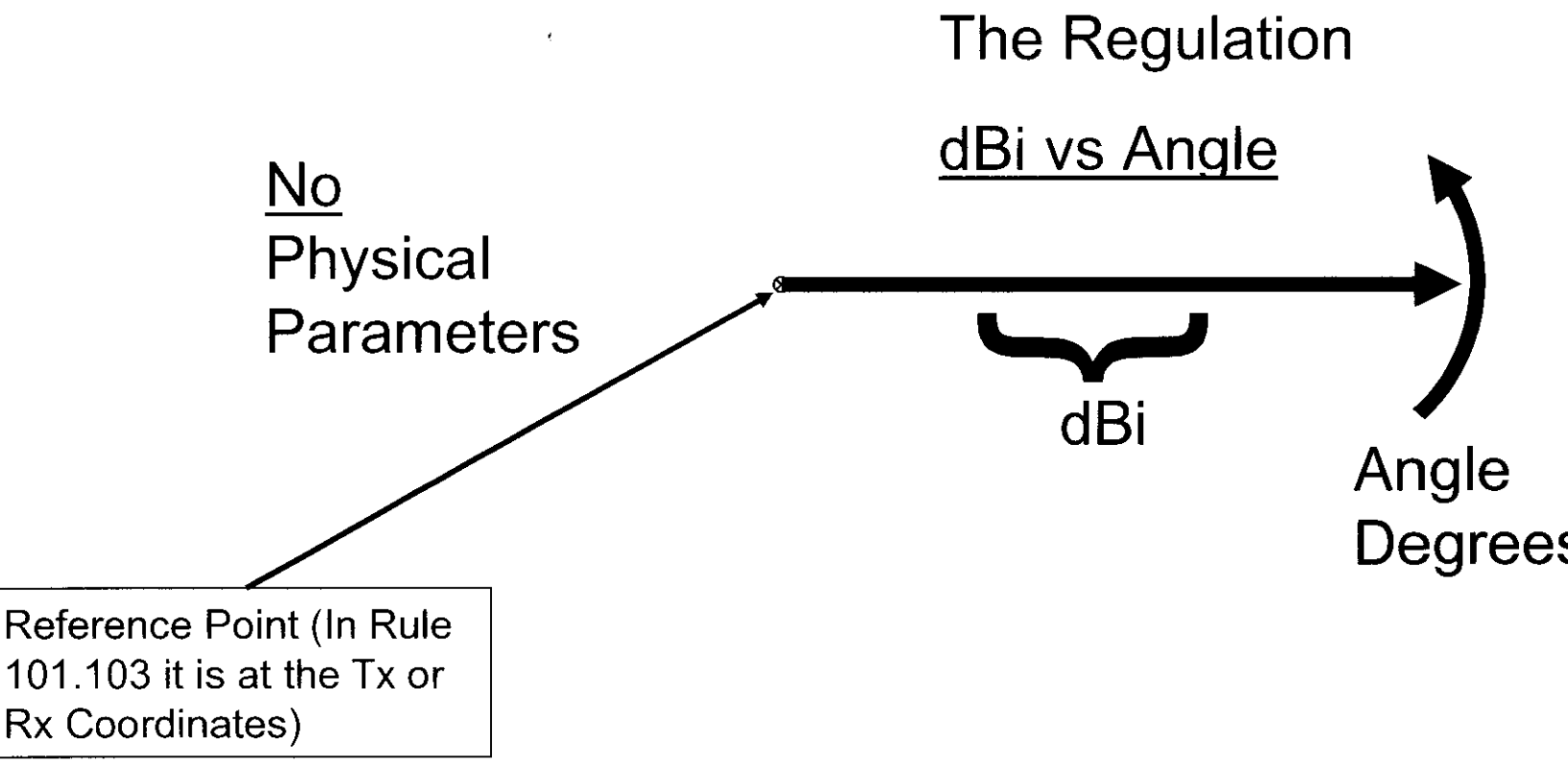
Rule 101.115

WTB Docket No 07-121
Rule 101.115

M	Minimum radiation suppression to angle in degrees from center-line of main beam in decibels						
Min-imum an-tenna gain (dbi)	5° to10°	10° to 15°	15° to 20°	20° to 30°	30° to 100°	100° to 140°	140° to 180°

Wireless Strategies Inc.

Rule 101.115

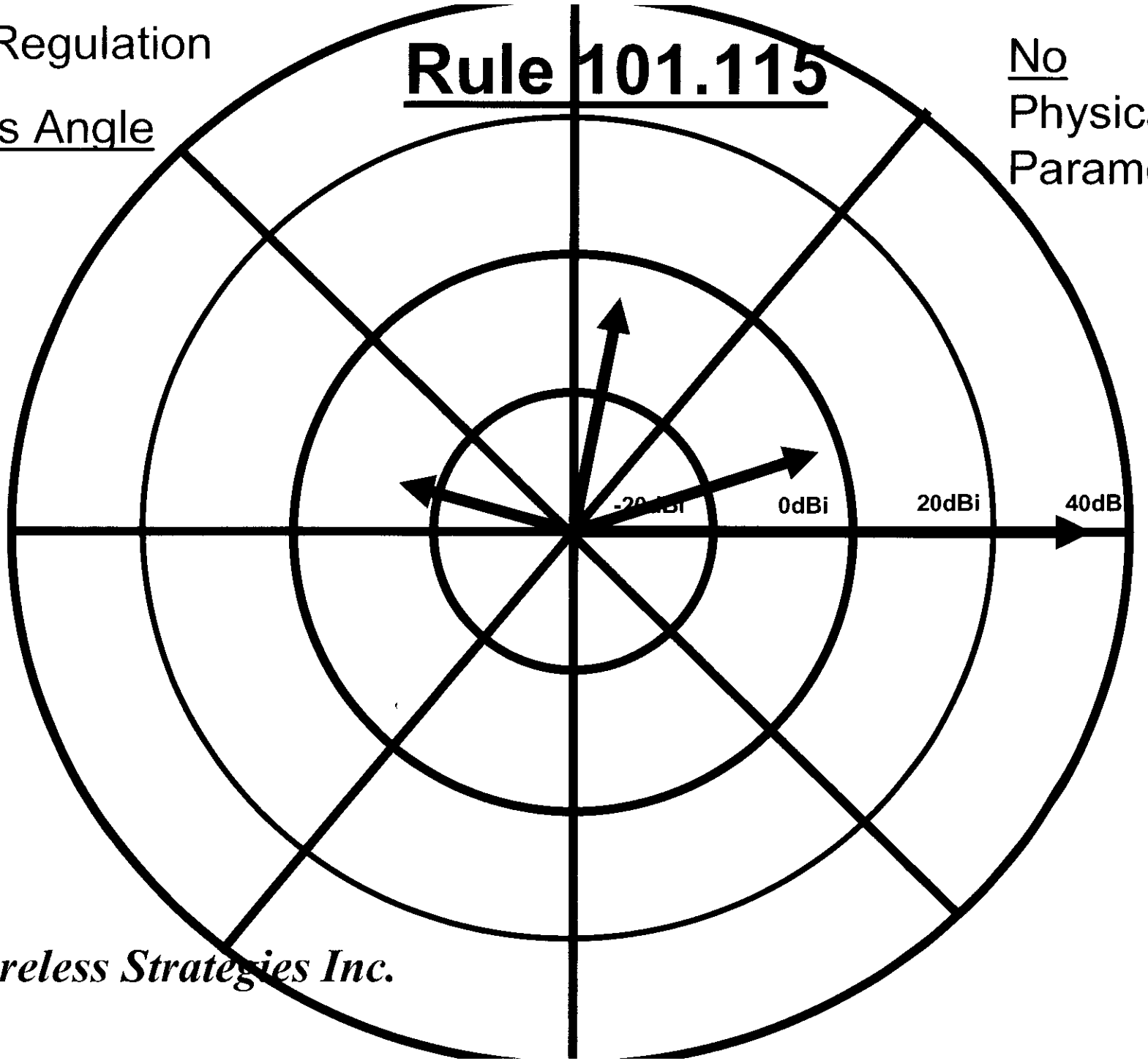

The Regulation
dBi vs Angle
No
Physical
Parameters
dBi
Angle
Degrees
Reference Point (In Rule 101.103 it is at the Tx or Rx Coordinates)

The Regulation

dBi vs Angle

Rule 101.115

No Physical Parameters



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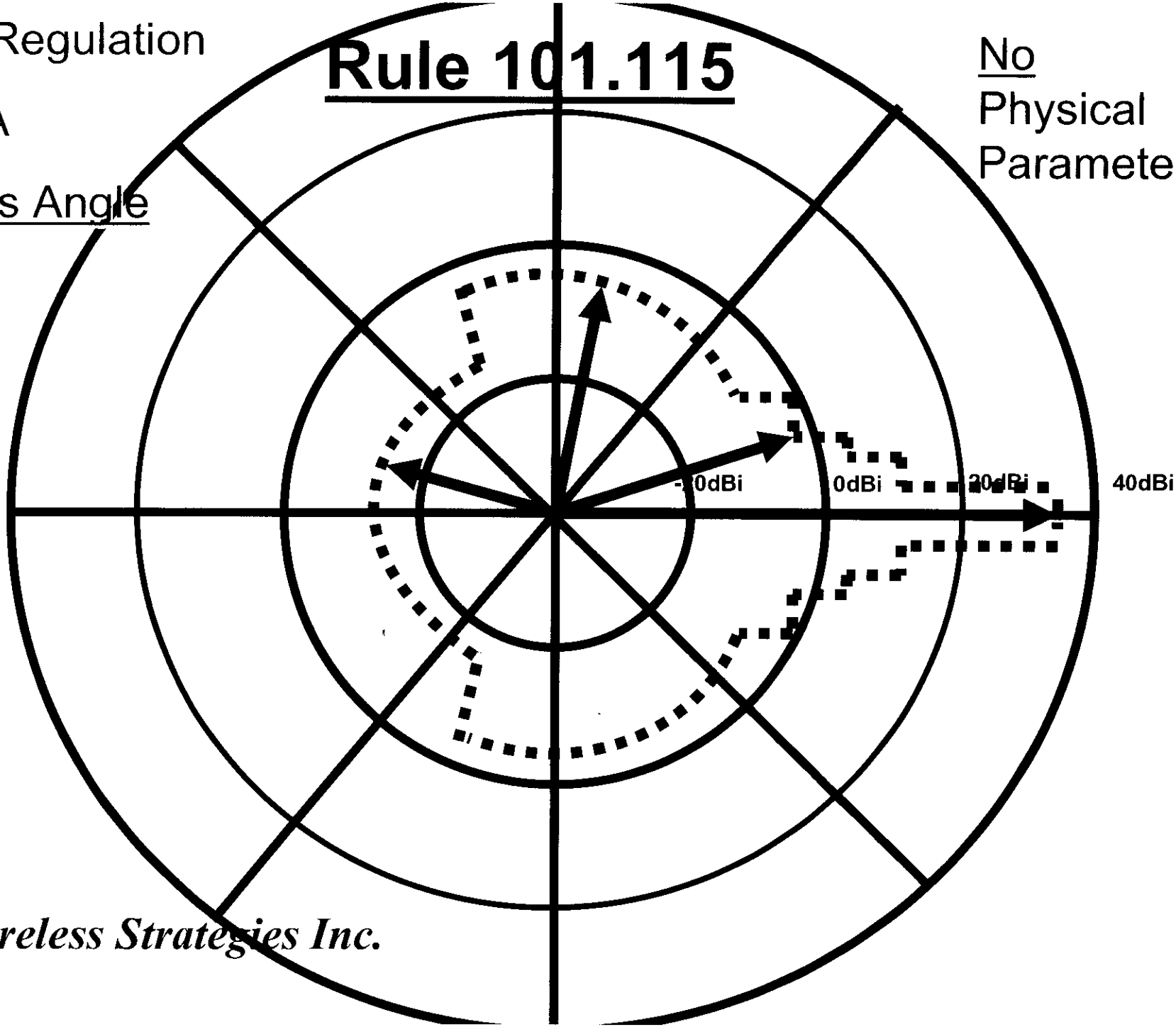
The Regulation

Cat A

dBi vs Angle

Rule 101.115

No Physical Parameters



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Facilitating Innovation

- Rule 101.115 of the Rules specify the Electrical Requirements (dBi vs Angle)

- Rule 101.115 of the Rules do not specify any physical characteristics nor how the Electrical Requirements are met*

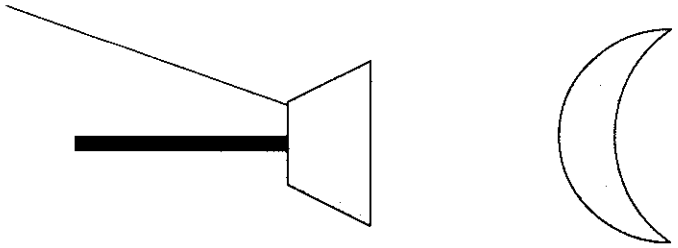
** -By not specifying HOW, the Commission allows and encourages industry to innovate.*

Rule 101.115 of the Rules

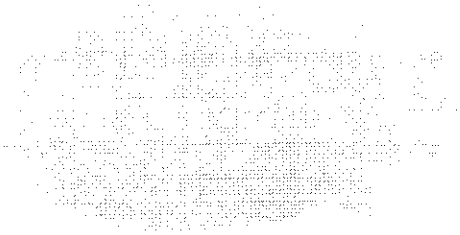
Antenna Radiating Elements Not Specified

Feed Horn with Convex Reflector

hysical Location Not Specified

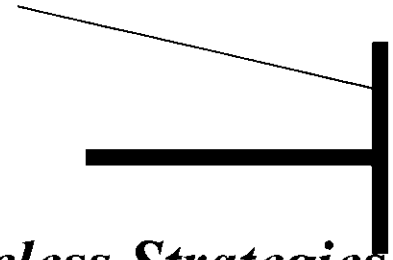


RPE Not Specified



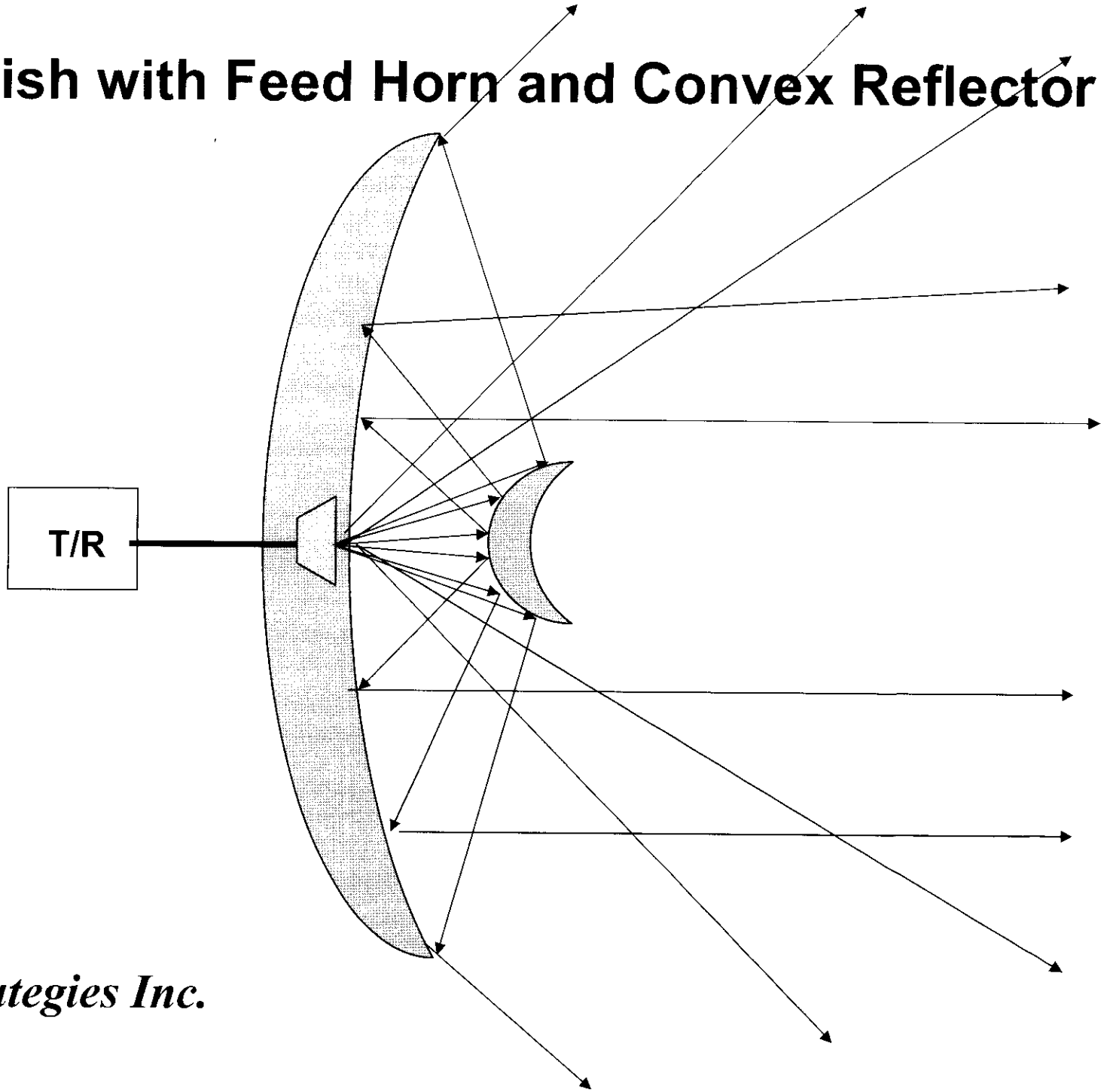
Dipole

hysical Location Not Specified



RPE Not Specified

Parabolic Dish with Feed Horn and Convex Reflector



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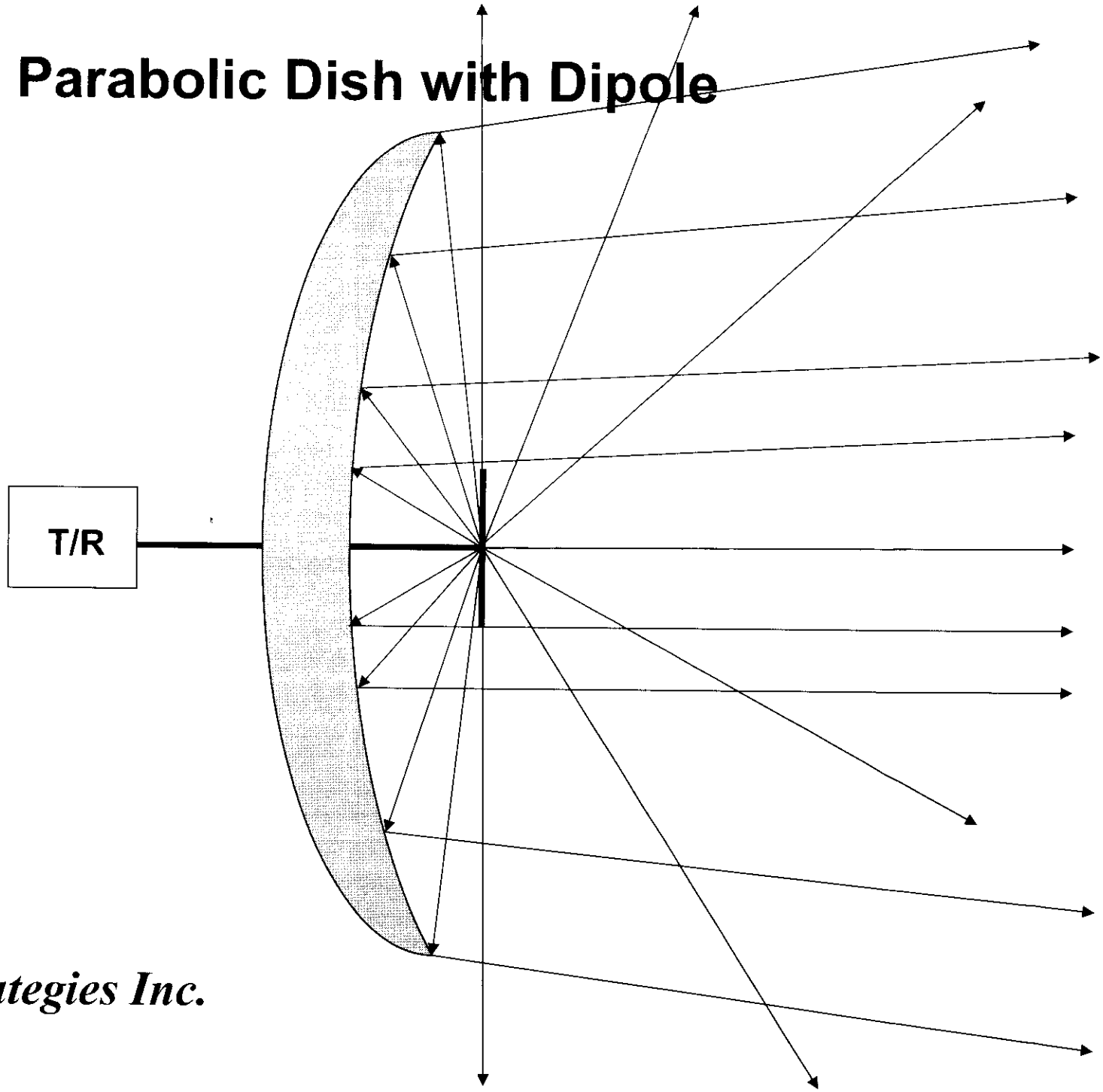
Parabolic Dish with Dipole



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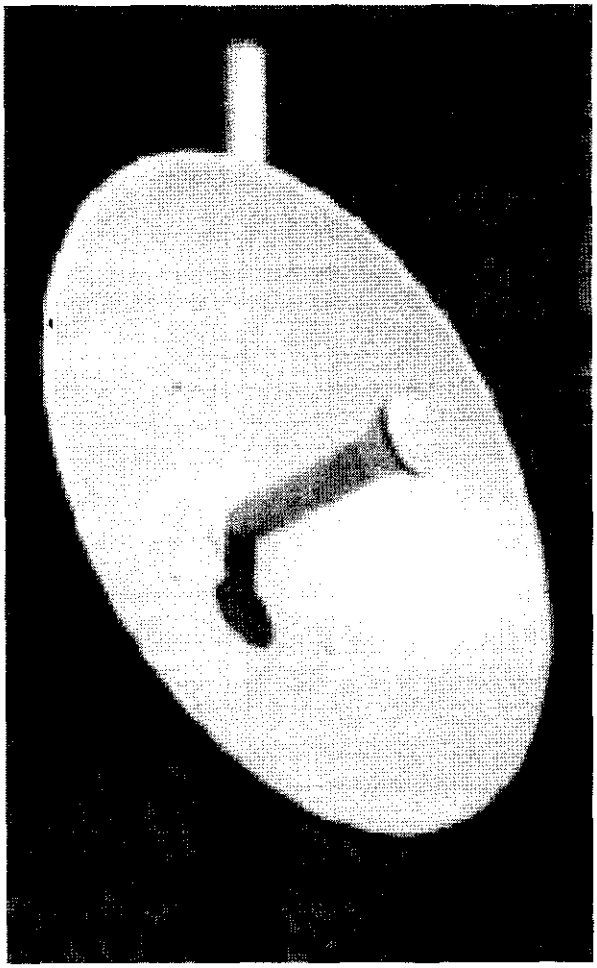
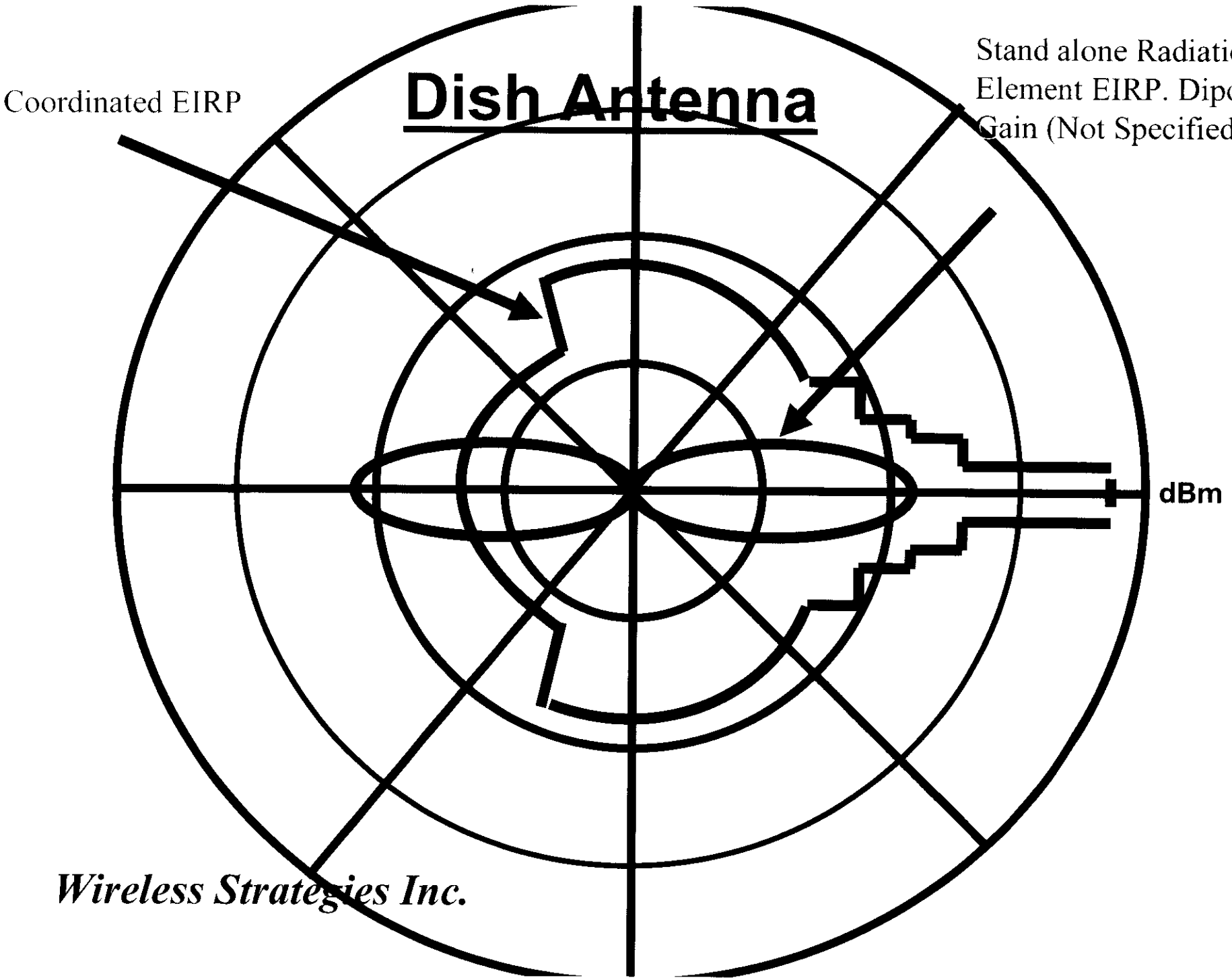
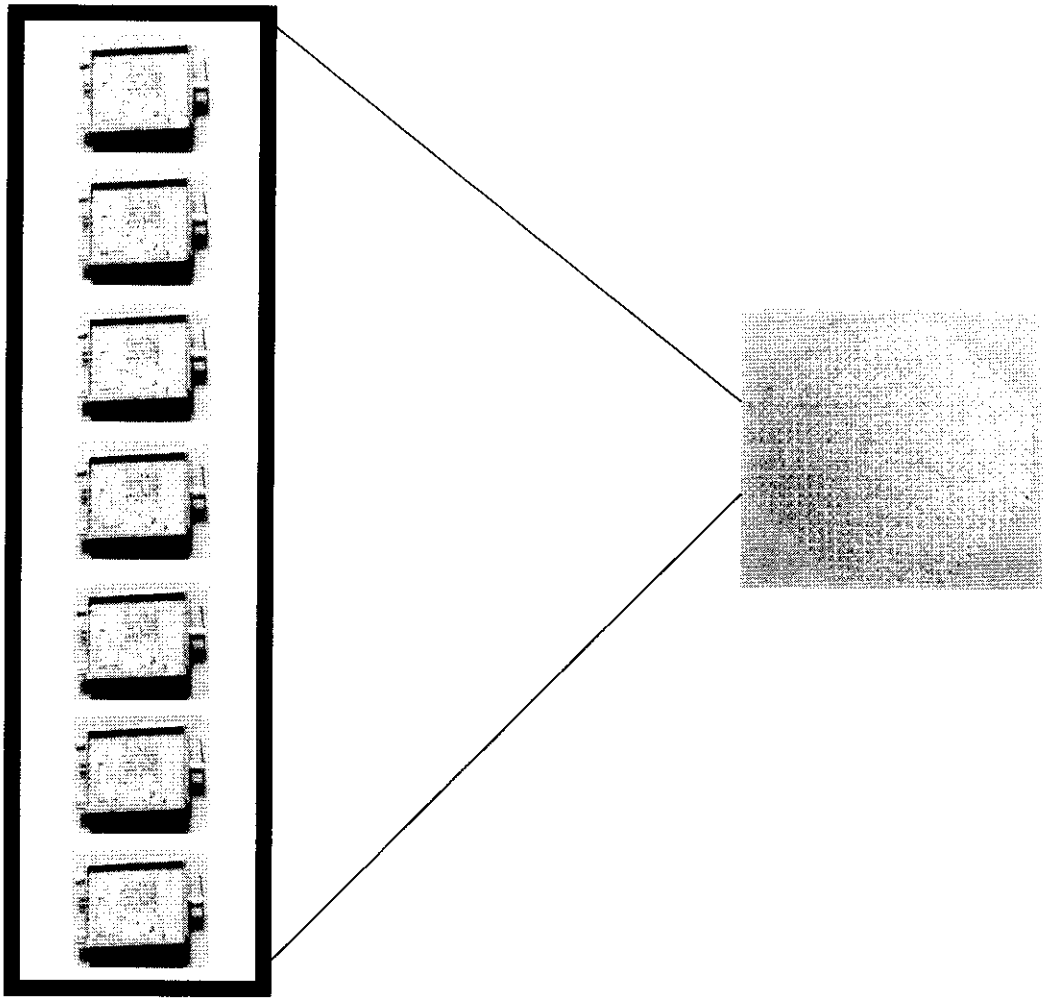
Transceiver and Radiator Element's Location and RPE Not Specified for a Dish Antenna




Dish Antenna
Coordinated EIRP
Stand alone Radiation Element EIRP. Dipole Gain (Not Specified)
dBm
Wireless Strategies Inc.

Transceiver and Radiator Element's Location and RPE Not Specified for a Multi-Array Antenna

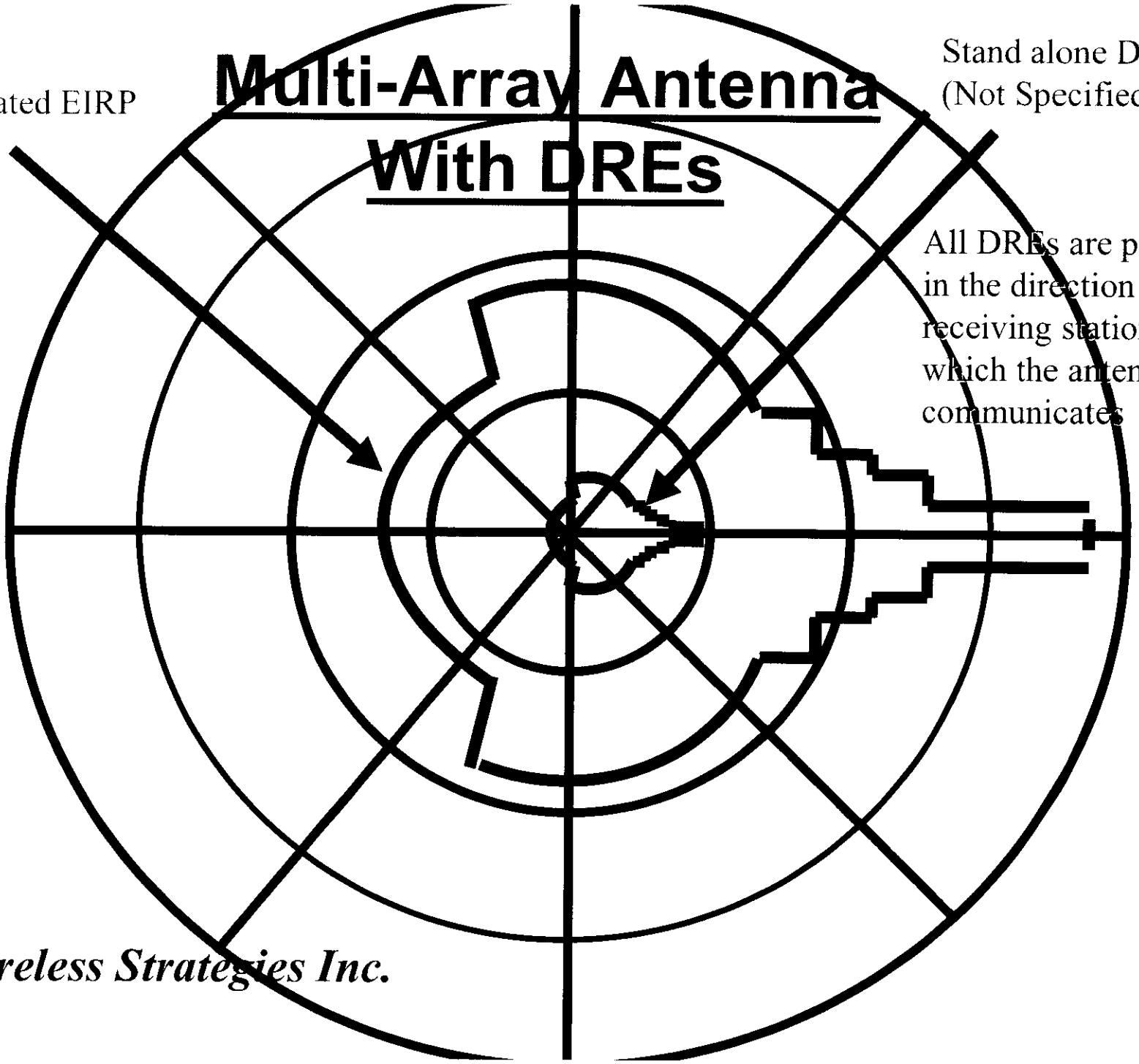


dinated EIRP

Multi-Array Antenna With DREs

Stand alone DI
(Not Specified

All DREs are po
in the direction
receiving station
which the antenn
communicates



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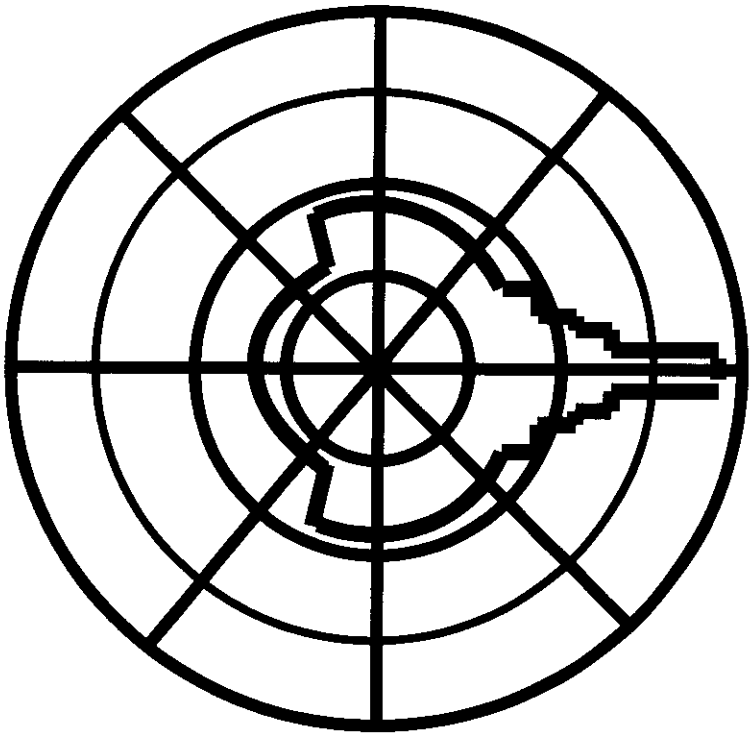
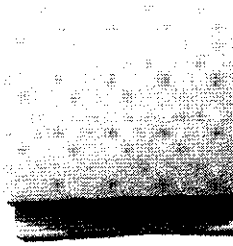
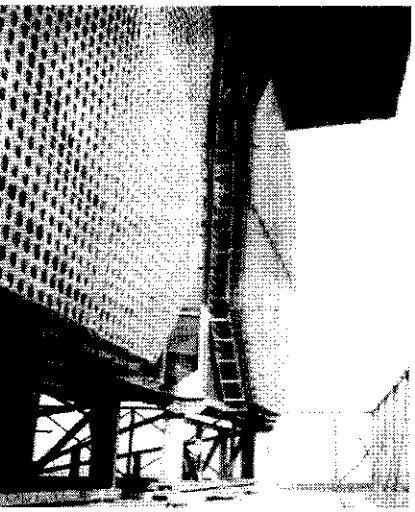
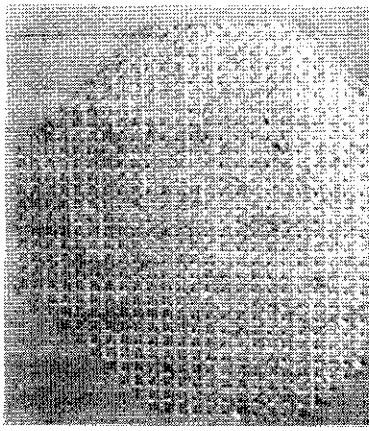
Any Type of Antenna that meets Rule 101.115 is Allowed









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WTB Docket No 07-121

- **WSI's Request for a Declaratory Ruling Requires that Antennas with DREs Must Meet Rule 101.115 of the Rules.**

- **Antennas with DREs Do Meet Rule 101.115 of the Rules**

WTB Docket No 07-121

equency Coordination Procedures (Rule 101.1

and

Interference Calculations TSB10, Section 3

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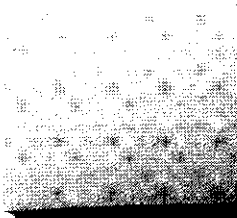
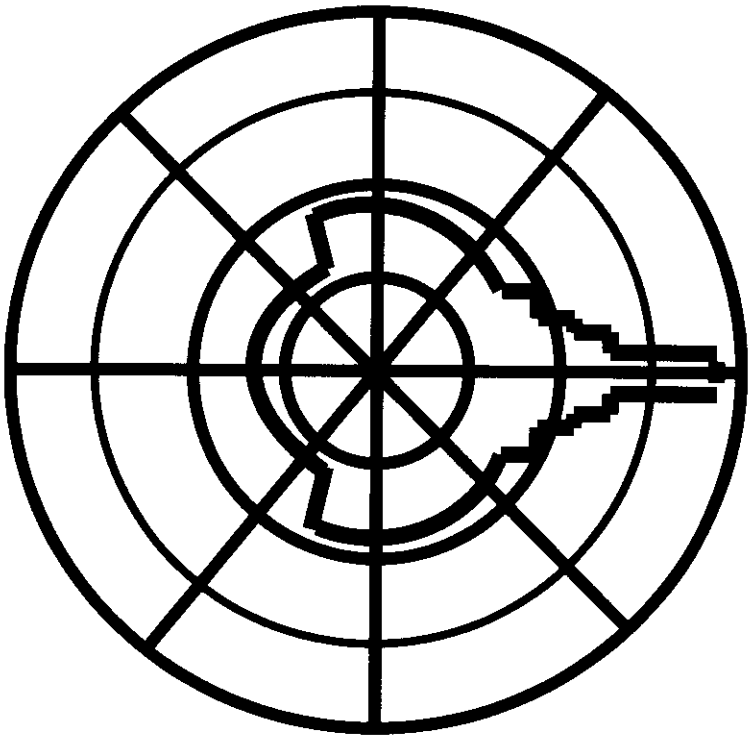
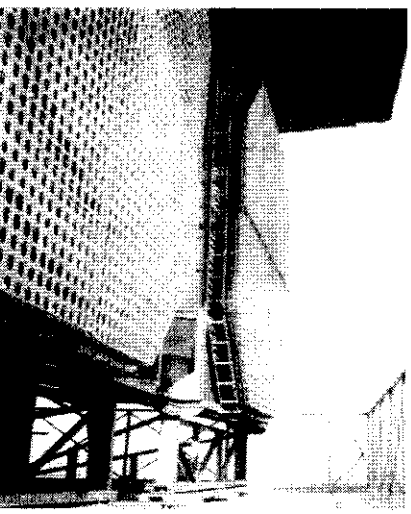
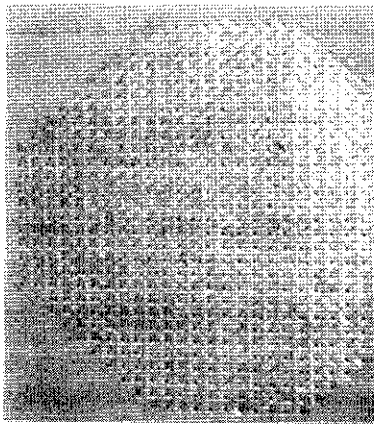
Any Type of Antenna that meets Rule 101.115 is Allowed









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